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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 23, 1997

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Building The
Wireless Future™

CTIA

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Michael F. Altschul
Vice President,
General Counsel

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, DC 20554

Re: *Ex parte* communication: Revision of the Commission's Rules
to Ensure Compatibility with Enhanced 911 Emergency Calling
Systems: CC Docket No. 94-102

Dear Mr. Chairman:

Over the past year, CTIA has sponsored a series of forums to address technical issues related to the delivery of wireless enhanced 9-1-1 ("E 9-1-1") services. Last week, CTIA convened a meeting of wireless industry representatives, technical experts and consumer organizations¹ to obtain a consensus on how to support TTY/TDD technology over digital wireless systems. At this Forum, all four interest groups² determined that continued collaborative efforts are necessary and that more time is needed to implement the best solution for TTY/TDD users. While the parties are committed to working together on such efforts, they agreed that an extension of time, not to exceed eighteen months, is needed, to accomplish their goals. Accordingly, CTIA, supported by the parties who attended the Forum, requests that the Commission extend its initial compliance date for implementation of 911 services over digital wireless systems for TTY/TDD users from October 1, 1997, to April 1, 1999.

At the Forum, the parties established three working groups that will address the delivery of TTY/TDD through wireless digital systems. The eighteen month extension

¹ See attached for list of participants.

² The four interest groups include the wireless industry (carriers and manufacturers), manufacturers of TTY equipment (for service providers and consumers), 9-1-1 and relay service providers, and consumer groups represented by TDI and Galludet University.

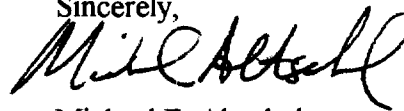


will provide these working groups with the time they require to develop and implement an effective work plan to deliver 911 services to TTY/TDD users through digital wireless systems. Attached is a copy of the Forum's Resolution Document which defines the agreements reached by the parties, the scope of work, and the operational issues for each work group.

In a related matter, based on the Forum, the signatories to the original Wireless E 9-1-1 Consensus Agreement (CTIA, APCO, NENA, and NASNA), and PCIA and TDI are working cooperatively on a joint report to the Commission concerning the status of implementing 911 services over wireless systems for TTY/TTD users. In accordance with the Commission's rules, we intend to file the joint report with the Commission on October 1, 1997.

If you should need any additional information concerning this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Altschul", written in a cursive style.

Michael F. Altschul

Attachments (2)

cc: James Quello
Susan Ness
Rachelle Chong
Daniel Phythyon

Attachment A

SERVICE PROVIDERS & MANUFACTURERS

Charles Spann	Nortel	John Kalenowsky	Motorola
Brye Bonner	Motorola	Jeff Crollick	SCC Communications
Leon Rogers	NEC Americh	Latrice Kirkland	Aerial Communications
Bennie Smith	Nortel	David Holmes	AT&T Wireless Services
Jeremy Pemble	Siemens	Laura Ruby	AT&T Wireless Services
Paul Feldman	Matsushita	Annabel Gutierrez	Nortel
Terry Rayburn	Sprint PCS	Mary Madigan	PCIA
Ray Westbrook	GM on Star	Lee Whritenour	Bell Atlantic Mobile
Terri Brooks	Nokia	Al Thomas	BellSouth Cellular
Richard Sweet	QualComm	Wesley Howe	GTE Wireless
Jim Tomcik	QualComm	Watson Zan	Rogers Cantel
Lisa Roberts	CTIA	Mike Patrick	Pacific Bell Mobile Srvcs
Doug Neeley	Ericsson	Javan Erfanian	Bell Mobility
John Suprock	Motorola	Mark McAllister	SBC Communications
Ed Hall	CTIA	Semih Sahin	Pacific Bell Mobile Srvcs
Bob Montgomery	CTIA	Annie Nguyen	CSX Communications
Billie Ragsdale	BellSouth (NENA)	Chris Wallace	Nokia
Wendy Chow	CTIA	Ken Wells	Lucent Technologies
Garry Bennett	Lucent Technologies	Ali Kuzchkanani	Lukas, McGowan
Christopher Kingdon	Ericsson, Inc.	Ed Velez	American Personal Comm.
Barbara Baffer	Ericsson, Inc.	Diana Donovan	Lucent Technologies
Paul Miller	Motorola	Shahran Hgati	LMNG

CONSUMER GROUPS

Claude Stout	Telecommunications for the Deaf, Inc.
Norman Williams	Gallaudet University
Judy Harkins	Gallaudet University
Dick Brandt	Gallaudet University
Beth Singer	Gallaudet University
Karen Peltz Strauss	National Association of the Deaf

TTY MANUFACTURERS

Sidney Ander	Krown TTY Manufacturer
Pam Holmes	Ultra Tec Inc.
Ron Schultz	Ultra Tec Inc.

PUBLIC SAFETY

John Melcher	Texas E9-1-1
Brenda Kelly-Frey	State of Maryland/Maryland Relay
Toni Dunne	Texas 9-1-1 Commission

FEDERAL GOVERNMENT

Won Kim

Federal Communications Commission

Attachment B

RESOLUTION DOCUMENT

September 19, 1997

CTIA FORUM

Seeking Solutions To TTY/TDD Through Wireless Digital Systems

September 17-19, 1997

WORKING GROUP #1

NAME: Performance of TTY Signals over Voice Service

CHAIR:	Contact Information
Wesley Howe, GTE Wireless	770-391-1727 (p), 770-395-8505 (f), whowe@mobilnet.gte.com

SCOPE: Evaluate TTY over voice service. Establish benchmark expectations using lab tests/field tests. At point of usability benchmarking, Voice group and Data group combine. Identify present and future user expectations and operational issues (as defined below).

OPERATIONAL ISSUES:

(Seeking functional equivalency with wireline, including 9-1-1 operations)

- **Call progress indicators**
 - incoming call, etc.
- **Quality of service**
 - TTY vs. Voice
 - Cell Site hand-offs
- **Voice Feature functionality**
- **VCO/HCO**

RESOLUTION DOCUMENT

September 19, 1997

CTIA FORUM

Seeking Solutions To TTY/TDD Through Wireless Digital Systems

September 17-19, 1997

WORKING GROUP #2

Name: Performance of TTY Signals over Data Service

CHAIR:	Contact Information
Brye Bonner, Motorola	847-576-5920 (p), 847-536-5564 (f), bonner-CDYN30@email.mot.com

SCOPE: Evaluate TTY over data service. Establish benchmark expectations using lab tests/field tests. At point of usability benchmarking, Voice group and Data group combine. Identify present and future user expectations and operational issues (as defined below).

OPERATIONAL ISSUES:

(Seeking functional equivalency with wireline, including 9-1-1 operations)

- **Call progress indicators**
 - incoming call, etc.
- **Quality of service**
 - TTY vs. Voice
 - Cell Site hand-offs
- **Voice Feature functionality**
- **VCO/HCO**

RESOLUTION DOCUMENT

September 19, 1997

CTIA FORUM

Seeking Solutions To TTY/TDD Through Wireless Digital Systems

September 17-19, 1997

WORKING GROUP #3

Name: Coupling Work Group

Chairs	Contact information
David Holmes, AT&T Wireless	425-828-1843 (p), 425-828-1848 (f), david.holmes@attws.com
Doug Neeley, Ericsson	972-583-0562 (p), 972-583-1809 (f), doug.neeley@ericsson.com also:214-906-2649 (mbi), junkdog@gte.net

SCOPE: Identify optimal coupling, that is readily achievable, to minimize effect on error rate. Among its goals, this group shall strive to maximize compatibility with existing products and, to the extent readily achievable, provide a common solution for the voice and data service approaches (as defined below).

- 1. Evaluate issues/problems with acoustic coupling (for Baudot)**
 - Recommend techniques for improvement**
- 2. Specify requirements for electrical interface (TTY to wireless phone - including connectors) to support Baudot/speechband transmissions optimized for:**
 - compatibility with existing TTY/wireless phones**
 - minimum cost (e.g. use of other existing standards)**
- 3. Specify requirements for electrical interface to support digital transmission on wireless interfacing:**
 - V.18 etc. support**
 - connector commonality with Issue 2 (above), if possible**
 - utilize current standards (IS-131, etc.)**

Process for integrating Issues 1 and 3 (above):

- CTIA Systems Requirements Document**
 - implementation issues**
 - backward compatibility issues**